

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Lyndell Leroy Price, et. al,

Defendant.

Case No. 4:24-CR-565

**OPPOSED MOTION TO DISCLOSE DISCOVERABLE
MATERIALS PURSUANT TO A PROTECTIVE ORDER**

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, the United States asks the Court to permit it to meet its discovery pursuant to a protective order restricting disclosure.

Certain materials that implicate third-party privacy information and law enforcement sensitive information are included within the materials to be provided to defense counsel. Furthermore, there are sensitivities associated with the disclosure of investigative methods, names, and contact information of witnesses. The material to be provided to defense counsel cannot be redacted adequately because it has evidentiary value in this case. In addition, many of these materials are electronic in origin, making mitigation of these concerns through redaction problematic.

In addition to protecting the materials themselves, the United States also wishes to prevent any harassment of possible witnesses.

All these materials are collectively referred to in the proposed Protective Order as “Protective Order Material(s).” These materials include: all documents authored by law enforcement officers, along with supporting audio and video recordings, photographs, digital

devices, search warrants and other legal process secured in connection with the investigation, and criminal history reports. The proposed order accompanies this motion.

Counsel for Defendants Armani Williams and John Lee Price have no objection to the proposed protective order. *See* Certificate of Conference, *infra*. Counsel for Lyndell Leroy Price opposes the proposed protective order.

WHEREFORE, the United States respectfully asks this Court to permit disclosure of discovery materials consistent with the above requests.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney
Southern District of Texas

By /s/ Sebastian A. Edwards
Sebastian A. Edwards
Assistant United States Attorney
1000 Louisiana Street, Suite 2300
Houston, Texas 77002
Telephone: (713) 567-9000
Email: Sebastian.Edwards@usdoj.gov

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on May 12, 2025, to the CM-ECF system of the United States District Court for the Southern District of Texas for electronic delivery to all counsel of record.

/s/ Sebastian A. Edwards

Sebastian A. Edwards

Assistant United States Attorney

CERTIFICATE OF CONFERENCE

I certify that I have communicated with all counsel of record. Counsel for Lyndell Leroy Price objects to this motion. Counsel for Armani Williams and John Lee Price have no objections to this motion.

/s/ Sebastian A. Edwards

Sebastian A. Edwards

Assistant United States Attorney